

July 2, 2003

Ref. Docket Proceeding 03-104

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Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-B204  
Washington, DC 20554  
Charles Bushell

Dear Ms. Marlene Dortch,

Recently, the FCC has granted experimental licenses to BPL (Broadband over Power Lines) equipment manufacturers or utilities.

To date, no incorporated or independent interference research studies have been conducted in the U.S. to indicate any possible impacts BPL equipment might have on various spectrum of radio receiving equipment.

There are no health studies indicating the effects or possible impacts resulting from long-term exposure to persons residing in areas near BPL lines.

PLC (Power Line Communication) systems pose a significant interference potential to over-the-air radio services. Studies done by amateur radio service operators in Europe, Japan and the US leave little doubt that PLC that uses overhead electrical distribution wiring poses an interference risk to several radio services. Some calculation estimate that the ambient noise level near PLC systems could increase as much as 70 dB.

This may affect a consumer's ability to receive a number of commercial broadcast stations in the Short Wave radio spectrum. This may have economic impacts on the radio broadcasting station and may result in revenue loss. These revenue deletions will eventually lead the stations to cease operations on the air.

This may seriously interfere with governments and other agencies that use the HF radio spectrum including the ability to receive military long-range communications.

PLC would be an interference source to radio communications services and scientific observation stations may have to be abandoned due to the interference levels. This will no longer make it possible to continue research on using radio astronomical observations for various phenomenon's.

This increased level of interference would seriously interfere with the ability to communicate in a long-range capacity in times of national disasters. This would include the ability to communicate with stations located in countries or regions of the U.S. that otherwise have no alternative form of communication other than using the HF radio spectrum.

PLC operations between 2 MHz and 30 MHz are not a very efficient method of transferring data. Other technologies that exist may prove to be more a more cost effective and efficient choice.

Data transfer by PLC would be subjected to the same conditions as the power distribution grid. Areas that have outages would not be able to utilize PLC. Alternative means of transferring data would have to be developed as a backup thus, making it less cost effective in the long term.

Charles Bushell